

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
EASTERN DIVISION

CONSOLIDATED INDUSTRIES, LLC	)	
d/b/a WEATHER KING PORTABLE	)	
BUILDINGS,	)	
	)	
Plaintiff,	)	
	)	Civil Action No. 1:22-cv-01230-STA-jay
v.	)	
	)	Chief Judge S. Thomas Anderson
JESSE A. MAUPIN, BARRY D.	)	
HARRELL, ADRIAN S. HARROD,	)	
LOGAN C. FEAGIN, STEPHANIE L.	)	
GILLESPIE, RYAN E. BROWN, DANIEL	)	
J. HERSHBERGER, BRIAN L. LASSEN,	)	
ALEYNA LASSEN, and AMERICAN	)	
BARN CO., LLC,	)	
	)	
Defendants.	)	

**PLAINTIFF'S MOTION FOR FEES AND EXPENSES**

Pursuant to the Court's July 2, 2025 Order (ECF No. 233), Plaintiff submits this petition seeking expenses in the amount of \$157,685.76 and attorney's fees in the amount of \$115,325.00 against Defendants Jesse A. Maupin, Barry D. Harrell, Adrian S. Harrod, Logan C. Feagin, and American Barn Co., LLC, as a result of their failure to comply with the Court's August 29, 2023 Order (ECF No. 111). In support of this motion, Plaintiff has filed a declaration of its legal counsel, David L. Johnson, filed herewith as Exhibit 1.

Respectfully submitted,

/s/ David L. Johnson  
David L. Johnson, BPR #18732  
John H. Dollarhide, BPR #40041  
BUTLER SNOW LLP  
The Neuhoﬀ Building  
1320 Adams Street, Suite 1400

Nashville, TN 37208  
Telephone: (615) 651-6700  
Fax: (615) 651-6701  
[david.johnson@butlersnow.com](mailto:david.johnson@butlersnow.com)  
[john.dollarhide@butlersnow.com](mailto:john.dollarhide@butlersnow.com)

Daniel W. Van Horn, BPR #18940  
6075 Poplar Ave., Suite 500  
Memphis, TN 38119  
Telephone: (901) 680-7200  
Fax: (901) 680-7201  
[Danny.VanHorn@butlersnow.com](mailto:Danny.VanHorn@butlersnow.com)

*Attorneys for Plaintiff*

### **CERTIFICATE OF SERVICE**

I hereby certify that on July 16, 2025, I filed the foregoing petition with the Court using the ECF system, which will provide notice and a copy to counsel of record:

Thomas G. Pasternak  
Benjamin S. Morrell  
TAFT STETTINIUS & HOLLISTER LLP  
111 East Wacker Drive, Suite 2600  
Chicago, IL 60601  
Telephone: (312) 527-4000  
Facsimile: (312) 527-4011  
[tpasternak@taftlaw.com](mailto:tpasternak@taftlaw.com)  
[bmorrell@taftlaw.com](mailto:bmorrell@taftlaw.com)

And to the following via U.S. Mail and email.

Brian L. Lassen  
Aleya Lassen  
1405 N. Fort Grant Road  
Willcox, AZ 85643  
[willcoxbuildings@pm.me](mailto:willcoxbuildings@pm.me)

/s/ David L. Johnson

David L. Johnson